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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 | IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

18 This Document Relates to: *Dell Inc., et al. v. Hitachi Ltd. et al.*, No. 13-cv-02171

DECLARATION OF LAURA K

**DECLARATION OF LAURA K. LIN IN
SUPPORT OF DEFENDANT LG
ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO SEAL**

20 | *Technicolor SA, No. 3:13-cv-05262*

[Administrative Motion to Seal and [Proposed] Order filed concurrently herewith]

21 | Sears, Roebuck and Co. and Kmart

Judge: Hon. Samuel Conti

Date: February 27, 2015

Time: 10:00 a.m.

Ctrm: 1, 17th Floor

Siegel v. Hitachi, Ltd., No. 11-cv-05502

31 8 , , ,

25 | Siegel v. Technicolor SA, No. 13-cv-052

26 | *Target Corp. v. Chunghwa Picture Tubes, Ltd.*, No. 11-cv-05514

1 *ViewSonic Corporation v. Chunghwa Picture*
2 *Tubes Ltd., No. 14-cv-2510*

3 *Electrograph Systems, Inc., et al. v. Hitachi,*
4 *Ltd., et al., No. 3:11-cv-01656-SC*

5 *Electrograph Systems, Inc., et al. v.*
6 *Technicolor SA, et al., No. 3:13-cv-05724-SC*

7 *CompuCom Sys., Inc. v. Hitachi, Ltd., et al.,*
8 *No. 3:11-cv-06396-SC*

9 *Interbond Corp. of Am. v. Hitachi, Ltd. et al.,*
10 *No. 3:11-cv-06276-SC*

11 *Interbond Corp. of America v. Technicolor SA,*
12 *et al., No. 3:13-cv-05727-SC*

13 *Office Depot, Inc. v. Hitachi, Ltd. et al., No.*
14 *3:11-cv-06276-SC*

15 *Office Depot, Inc. v. Technicolor SA, et al.,*
16 *No. 3:13-cv-05726-SC*

17 *P.C. Richard & Son Long Island Corp., et al.,*
18 *v. Hitachi, Ltd., et al., No. 3:12-cv-02648-SC*

19 *P.C. Richard & Son Long Island Corp., et al.*
20 *v. Technicolor SA, et al., No. 3:13-cv-05725-*
21 *SC*

22 *Schultze Agency Services, LLC on behalf of*
23 *Tweeter Opco, LLC and Tweeter Newco, LLC*
24 *v. Hitachi, Ltd., et al., No. 3:12-cv-2649-SC*

25 *Schultze Agency Services, LLC on behalf of*
26 *Tweeter Opco, LLC and Tweeter Newco, LLC*
27 *v. Technicolor SA., et al., No. 3:13-cv-05668-*
28 *SC*

Tech Data Corporation; Tech Data Product
Management, Inc.; v. AU Optronics Corp., et
al., No. 13-cv-00157

Best Buy Co, Inc., et al v. Hitachi, Ltd.,
Individual Case No. 11-cv-05513

Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC

1 I, Laura K. Lin, declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record
3 for Defendant LG Electronics, Inc. (“LGE”) in the above entitled action. I am licensed in the State
4 of California and admitted to practice before this Court. I make this declaration based on my
5 personal knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
8 the LGE Defendants’ Administrative Motion to Seal.

9 3. LG seeks permission to file under seal the highlighted portions of the sealed
10 version of Defendants’ Opposition to Plaintiffs’ Motion to Partially Exclude the Expert Report and
11 Opinions of Janusz A. Ordover;

12 4. The portions the documents referenced in Paragraph 3 contain discussion, analysis,
13 references to, or information taken directly from, material designated by other parties in this
14 matter as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” under the Stipulated Protective
15 Order (Dkt. No. 306) in this case.

16 5. LG further seeks permission to file under seal the following documents in their
17 entirety Exhibits 1, 4, 5, 10, and 11 to the Declaration of Laura K. Lin in Support Defendants’
18 Opposition to Plaintiffs’ Motion to Partially Exclude the Expert Report and Opinions of Janusz A.
19 Ordover (“Lin Declaration”).

20 6. The documents referenced in paragraph 5 are excerpts of the opinions and
21 depositions transcripts of Defendants’ expert witnesses. These excerpts were designated as
22 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” by Defendants pursuant to the Stipulated
23 Protective Order (Dkt. No. 306).

24 7. LG further seeks permission to file under seal the following documents in their
25 entirety Exhibits 2, 3, 6, 7, 8 and 9 to the Declaration of Laura K. Lin in Support Defendants’
26 Opposition to Plaintiffs’ Motion to Partially Exclude the Expert Report and Opinions of Janusz A.
27 Ordover (“Lin Declaration”).

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1 8. The documents referenced in paragraph 8 contain excerpts of the opinions and
2 depositions transcripts of Plaintiffs' expert witnesses. These excerpts were designated as as
3 "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" by Plaintiffs under the Stipulated
4 Protective Order (Dkt. No. 306) in this case.

5 9. LGE seeks to submit the above material under seal in good faith in order to comply
6 with the Stipulated Protective Order in this action and the applicable Local Rules. Because the
7 information LGE seeks to submit under seal has been designated as Confidential or Highly
8 Confidential by other parties, LGE is filing the accompanying Administrative Motion, and will be
9 prepared to file an unredacted versions of the above-referenced documents in the public record if
10 required by Civil Local Rule 79-5(e).

11 I declare under penalty of perjury under the laws of the United States that the foregoing is
12 true and correct.

13 || Executed on January 16, 2015, in San Francisco, California.

/s/ *Laura K. Lin*
LAURA K. LIN